

JONATHAN O. PENA, ESQ.
CA Bar ID No. 278044
Peña & Bromberg, PLC
2440 Tulare St., Suite 320
Fresno, CA 93721
Telephone: 559-412-5390
Fax: 866-282-6709
info@jonathanpena.com
Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

Martha Catalina Garcia,
Plaintiff,

vs.

Kilolo Kijakazi, Acting
Commissioner of Social Security,
Defendant.

Case No. 1:20-CV-01642

STIPULATION AND ORDER FOR
EXTENSION OF TIME

(Doc. 15)

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 30-day extension of time, from July 26, 2021 to August 25, 2021, for Plaintiff to serve on defendant with PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's first request for an extension of time. Plaintiff respectfully states that the requested extension is necessary due to eleven merit briefs and

eleven letter briefs being due on the same week. Counsel also has thirty-three administrative hearings set for the same period. Counsel requires additional time to brief the issues thoroughly for the Court's consideration. Defendant does not oppose the requested extension. Counsel apologizes to the Defendant and Court for any inconvenience this may cause.

Respectfully submitted,

Dated: July 20, 2021

PENA & BROMBERG, ATTORNEYS AT LAW

By: /s/ Jonathan Omar Pena
JONATHAN OMAR PENA
Attorneys for Plaintiff

Dated: July 20, 2021

PHILLIP A. TALBERT
Acting United States Attorney
DEBORAH LEE STACHEL
Regional Chief Counsel, Region IX
Social Security Administration

By: */s/ Margaret Lehrkind
Margaret Lehrkind
Special Assistant United States Attorney
Attorneys for Defendant
(*As authorized by email on July 20, 2021)

ORDER

Pursuant to the parties' above stipulation (Doc. 15), and for good cause shown, IT IS HEREBY ORDERED that Plaintiff shall have a 30-day extension of

1 time, from July 26, 2021, to August 25, 2021, for Plaintiff to serve on defendant
2 with PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT. All other dates in
3 the Court's Scheduling Order (Doc. 13) shall be extended accordingly.
4

5 IT IS SO ORDERED.

6 Dated: **July 22, 2021**

/s/ Sheila K. Oberto
7 UNITED STATES MAGISTRATE JUDGE
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28